

Presentment Date: April 24, 2013 at 12:00 p.m., E.T.
Objection Deadline: April 23, 2013 at 11:30 a.m., E.T.

JONES DAY
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Attorneys for Lehman Brothers Holdings Inc.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | | |
|--|---|-------------------------|
| -----X | : | |
| In re: | : | Chapter 11 |
| | : | |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> , | : | Case No. 08-13555 (JMP) |
| | : | |
| Debtors. | : | (Jointly Administered) |
| | : | |
| -----X | : | |

**NOTICE OF PRESENTMENT OF STIPULATION
AND ORDER WITHDRAWING CLAIM NUMBER 22202**

PLEASE TAKE NOTICE OF THE FOLLOWING:

1. Lehman Brothers Holdings Inc. ("LBHI") as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, and Maximilian Coreth (the "Claimant" and together with LBHI, the "Parties"), will present for signature the Stipulation and Order Withdrawing Claim Number 22202 attached hereto as Exhibit A (the "Stipulation and Order")¹ to the Honorable James M. Peck, United States Bankruptcy Judge, on **April 24, 2013 at 12:00 noon (Eastern Time)** (the "Presentment Date").

¹ Capitalized terms used herein but not otherwise defined have the meanings given to them in the Stipulation and Agreed Order.

2. Objections, if any, to the proposed Stipulation and Order must be made in writing, with a hard copy to Chambers, conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York and be filed with the Bankruptcy Court and served upon the Parties so as to be actually received, **not later than 11:30 a.m. (Eastern Time) on April 23, 2013** (the “Objection Deadline”).

3. If an objection is properly served and filed before the Objection Deadline, a hearing will be held to consider the Stipulation and Order and the objection at a date and time to be set by the Court.

4. Objections not served and filed on or before the Objection Deadline may not be considered by the Court. Unless an objection is received by the Objection Deadline, the Stipulation and Order may be signed and entered on the Presentment Date without further notice or hearing.

Dated: April 16, 2013
New York, New York

JONES DAY

/s/ Kelly A. Carrero
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Attorneys for Lehman Brothers Holdings Inc.

EXHIBIT A

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

| | | |
|--|---|------------------------|
| ----- X | | |
| In re | : | Chapter 11 Case No. |
| | : | |
| LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> | : | 08-13555 (JMP) |
| | : | |
| Debtors. | : | (Jointly Administered) |
| ----- X | | |

STIPULATION AND ORDER WITHDRAWING CLAIM NUMBER 22202

Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, and Maximilian Coreth (the "Claimant" and together with LBHI, the "Parties"), hereby stipulate and agree as follows:

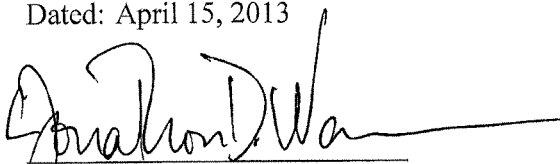
RECITALS

- A. On September 15, 2008, LBHI filed a voluntary case under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of New York (the "Court").
- B. On September 21, 2009, Claimant filed proof of claim number 22202 against LBHI for \$22,620,000 plus unliquidated and/or undermined amounts (the "Claim").
- C. On March 8, 2013, LBHI filed an objection to the Claim in the four hundredth omnibus objection to claims, dated March 8 (the "Four Hundredth Omnibus Objection to Claims").

AGREEMENT

1. This Stipulation and Order shall become effective upon execution by all Parties and entry by the Court (the "Effective Date").
2. Upon the Effective Date, without Claimant's admitting any of LBHI's assertions, defenses, and/or allegations in the Four Hundredth Omnibus Objection to Claims:
 - a. the Claim shall be deemed withdrawn with prejudice subject to this Stipulation and Order; and
 - b. the Court-appointed claims agent shall modify the claims register to reflect the terms of this Stipulation and Order.
3. This Stipulation and Order applies only to the Claim asserted against LBHI. The withdrawal of the Claim is without prejudice to any claims asserted by Claimant against Lehman Brothers Inc.

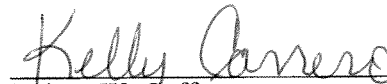
Dated: April 15, 2013


Jonathon D. Warner (JDW5195)
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Telephone: (212) 924-7111

Attorneys for Maximillian Coreth

SO ORDERED:

Dated: New York, New York
April __, 2013


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*Attorneys for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

UNITED STATES BANKRUPTCY JUDGE